

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA	:	<u>3500 PROTECTIVE ORDER</u>
	:	
- v. -	:	S5 15 Cr. 379 (PKC)
	:	
OTTO SALGUERO MORALES, and	:	
RONALD SALGUERO PORTILLO,	:	
	:	
Defendants.	:	

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HON. P. KEVIN CASTEL, District Judge:

1. WHEREAS, the United States of America, Audrey Strauss, Acting United States Attorney for the Southern District of New York, by and through Assistant United States Attorneys Jason A. Richman, Benjamin W. Schrier, and Kyle A. Wirshba, seeks an order restricting the dissemination of material already produced or that will be produced pursuant to the Jencks Act and *Giglio v. United States*, 405 U.S. 150 (1972) ("3500 Material") in connection with the trial in this matter ("Trial");

2. WHEREAS, based on: (i) information in the public filings to date related to OTTO SALGUERO MORALES and RONALD SALGUERO PORTILLO, (the "Defendants") indicating that the 3500 Material will contain sensitive information regarding assistance to law enforcement by others in sensitive ongoing investigations in Guatemala and elsewhere as well as actual and threatened acts of violence against victims whose identities are not presently

public; and (ii) the consent of the Defendants, by and through their attorneys Robert Feitel, Esq. and Linda George, Esq., the Court finds that there is good cause for the requested relief;

3. IT IS HEREBY ORDERED that the Defendants and their defense teams -- including but not limited to Mr. Feitel and Ms. George, and any U.S.-based paralegals, investigators, and interpreters working for the Defendant or their counsel -- shall not transport or transmit any of the 3500 Material outside of the United States;

4. IT IS FURTHER ORDERED that the Defendants and their defense teams shall not show or disseminate any of the 3500 Material to anyone other than each Defendant's and defense team's own U.S.-based paralegals, investigators, and interpreters working for the Defendants or their counsel;

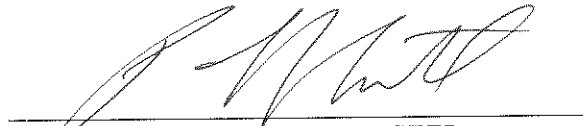
5. IT IS FURTHER ORDERED that the Defendants shall not possess any of the 3500 Material, either before, during, or after the Trial, except when reviewing the 3500 Material in the presence of Mr. Feitel, Ms. George, or U.S.-based paralegals, investigators, and interpreters working for the Defendants or their counsel;

6. IT IS FURTHER ORDERED that the Defendants and their defense teams shall return to the Government, or destroy, all of

the 3500 Material at the close of the Trial or when any appeals have become final; and

7. IT IS FURTHER ORDERED that defense counsel may seek authorization of the Court, with notice to the Government, to provide certain specified materials to persons whose access to such materials is otherwise prohibited by this Order, if it is determined by the Court that such access is necessary for the purpose of preparing the defense of the case.

SO ORDERED:

  
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HONORABLE P. KEVIN CASTEL  
United States District Court  
Southern District of New York

9-10-21  
Date